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and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF DEFENDANTS'
REPLY SUPPORTING MOTION TO
DISMISS CASES FOR FAILURE TO
COMPLY WITH PTO 31 AND SHOW-
CAUSE ORDERS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, state as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer
4 this Declaration in the above-captioned matter in support of Uber’s Reply supporting its Motion to
5 Dismiss Cases for Failure to Comply with PTO 31 and Show-Cause Orders.
6

7 2. Attached as **Exhibit 1** is a table identifying the 27 plaintiffs the Court ordered to show
8 cause for providing non-bona-fide receipts by October 17, 2025. *See* ECF 3876; ECF 3972; ECF 4120.
9

10 3. Attached as **Exhibit 2** is a table identifying 133 plaintiffs who, as of December 12, 2025,
11 well beyond their respective response deadlines, have failed to respond to PTO 31 entirely. That is, these
12 Plaintiffs have not submitted a ride receipt or a statement explaining their unsuccessful attempts to
13 locate the receipt. These plaintiffs have not been dismissed pursuant to the Court’s Order Regarding
14 Defendants’ Amended Motion to Dismiss Cases for Failure to Comply with PTO 10 (ECF 4442).
15

16 4. In total, Uber received only 21 PTO 31 responses from the 181 plaintiffs listed in its
17 opening Motion as of December 12, 2025.
18

19 5. Attached as **Exhibit 3** is a true and correct copy of the fraudulent receipt provided by
20 MDL ID 2812 in this litigation.
21

22 6. Attached as **Exhibit 4** is a true and correct copy of the fraudulent receipt provided by
23 MDL ID 1914 in this litigation.
24

25 7. Attached as **Exhibit 5** is a true and correct copy of the fraudulent receipt provided by
26 MDL ID 3425 in this litigation.
27

28 8. Attached as **Exhibit 6** is a compendium of information regarding the 27 plaintiffs that the
Court found submitted non-bona-fide receipts in ECF 3876 and ECF 3972. This compendium includes
the names of these 27 plaintiffs, their reported addresses, the fraudulent receipts each of them submitted,

Uber's Defense Fact Sheets for each plaintiff, and the declarations Uber submitted from FTI Consulting, Inc. in ECF 3604 and ECF 3784 detailing the evidence of fraud as to each plaintiff.

9. Attached as **Exhibit 7** is a table identifying the 48 plaintiffs who were included in Uber's Motion to Dismiss Cases for Failure to Comply with PTO 31 and Show-Cause Orders for failure to provide a PTO 31 response, but who have (1) now provided a PTO 31 statement or ride receipt after the Court-ordered date; and/or (2) now claim a third party ordered the ride at issue; and/or (3) have already been dismissed pursuant to the Court's Order Regarding Defendants' Amended Motion to Dismiss Cases for Failure to Comply with PTO 10 (ECF 4442).

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: December 12, 2025

Respectfully submitted,

By: /s/ Christopher V. Cotton

Christopher V. Cotton (admitted *Pro Hac Vice*)

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